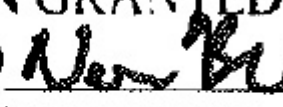


APPLICATION GRANTED
SO ORDERED 
VERNON S. BRODERICK
U.S.D.J. 4/17/23

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April 14, 2023

VIA ECF

Hon. Vernon S. Broderick
United States District Judge
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re: Bernier et al. v. Gard Recycling, Inc. et al.,
Case No.: 23-CV-761 (VSB)

Dear Judge Broderick:

This firm represents Plaintiffs in the above-referenced matter. We write to respectfully request that the Court adjourn for 30 days, until May 15, 2023, Plaintiffs' deadline to move for a default judgment in accordance with the Court's February 28, 2023 order. This is the second request of this kind.

Plaintiffs have served the corporate Defendants through the New York State Secretary of State, but have not yet served all individual Defendants, and therefore their time to answer has not yet expired. Plaintiffs have made several attempts to serve all individual Defendants and are continuing to attempt to serve them at their business and home addresses. Should the individual Defendants retain counsel and file an answer, their counsel will almost certainly represent the corporate Defendants and move to vacate the default, which is what Defendants did in a similar case that is currently pending in the SDNY. Anacacy v. DRS Group Inc., SDNY Doc. No. 22-4239 (GHW).¹ We therefore respectfully request that the Court extend Plaintiffs' deadline to move for a default judgment for 30 days.

We thank the Court for its consideration of this letter.

Respectfully submitted,

-----/s/-----
Michael Taubenfeld

¹ Notably, we have requested that the attorney in that matter accept service in this case, but he has declined to do so.